City Learning Trust
Inspiring Outstanding Achievement

SAFEGUARDING AND CHILD PROTECTION POLICY 2023/24

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Safeguarding & Child Protection Policy

Document Type	Safeguarding & Child Protection Policy		
Reference/Version Number	CLT-SCP-V2.4		
Summary	Child Protection is only one part of safeguarding and promoting welfare. By working proactively with other agencies, the need for action to protect children from harm, should be reduced.		
Associated Documents	Safer Recruitment Policy First Aid (Students) Education PREVENT Policy and Audit Code of Conduct Visitors to Academy Equality and Diversity Policy Early Year Personal Care Anti-Bullying Policy Designated Teacher for LAC	Positive Handling Policy and Procedures EVOLVE Risk Assessments RSE Whistleblowing Policy Behaviour Policy Health & Safety Policy E-Safety Policy Separated Parents Policy Alcohol & Substance Misuse (Students)	
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VERSION CONTROL

Version No:	Type of change	Date	Revisions from previous version
0.1	New Document	April 2020	New Policy
1.0	Annual Review	Sept 2020	Corporate format
2.0	Annual Review	Sept 2021	Updated with new legislation, guidance. Typos etc
2.0	Update	April 2022	Name spelling of LADO
2.1	Annual Review	Sept 2022	Wording changed from peer-on-peer to child-on-child. Other minor updates to follow legislation.
2.2	Annual Review	Sept 2023	Contact details for DSL/DDSL all updated Section 1.2.viii, ix & x added Section 1.3.g.ii updated, 1.3.h & i added Section 1.4.a updated Section 1.4.b.x updated Section 2.1 added Section 2.2.c & d added, 2.2.e.i updated, 2.2.e.vii & viii added Section 2.3.d.v, vi, vii, viii & ix added Section 2.4.c, d, e, f, g & h added Section 2.5.e updated, 2.5.h added Section 2.6 added Section 4.b & e added Section 4.4.1.a updated Section 4.8.e added Section 4.9.2.c.vii and ix added, 4.9.2.d added Section 5.b.i updated Section 5.1.c updated, 5.1.i added Section 6 added Section 12.1.b.i added Section 14 linked policies updated Appendix B.2.a.iii & vi added
2.3	Additional amendment	Sept 2023	KCSIE date changed. Contact information further update.
2.4	Version control amendment	Sept 2023	Section 4.b & e should be Section 3.b & e in 2.2 revision

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IMPORTANT CONTACTS

ROLE	NAME & ORGANISATION	CONTACT DETAILS
Designated Safeguarding Lead (DSL)	**Haywood Academy & City College**: Catherine Hazel	01782 853535
	Mill Hill Primary Academy: Adele Mills.	01782 234466
	Smallthorne Primary Academy: Tina Steele.	01782 235265
	Trentham Academy: Lisa Hadgett.	01782 883200
Deputy Designated Safeguarding Lead (DDSL)	**Haywood Academy & City College**: Claire Ryder	01782 853535
	Mill Hill Primary Academy: Kate Salih.	01782 234466
	Smallthorne Primary Academy: Abbie Goodwin.	01782 235265
	Trentham Academy: Katie Barlow, Emma Hooper and Megan Walton.	01782 883200
City Learning Trust Safeguarding Leads	Nathan Legg and Marie Faichney	01782 853535
Local Authority Designated Officer (LADO)	John Hanlon	01782 235100
Designated Governor for Child Protection	**Haywood Academy & City College:** Kath Smith	ksmith@citylearningtrust.org
	Mill Hill Primary Academy: Barbara Mitchell	bmitchell@clt.smallthorne.coop
	Smallthorne Primary Academy: Barbara Mitchell	bmitchell@clt.smallthorne.coop
	Trentham Academy: Paul Archer	parcher@clt.trentham.coop
Channel helpline		020 7340 7264

1. INTRODUCTION

a. Our Academy fully recognises its responsibilities for safeguarding and Child Protection.

1.1 Policy Aims

a. The Academy aims to ensure that:
   i. Appropriate action is taken in a timely manner to safeguard and promote children's welfare
   ii. All employees are aware of their statutory responsibilities with respect to safeguarding
   iii. Employees are properly training in recognising and reporting safeguarding issues

b. We believe that children must be protected from harm at all times and that appropriate action will be taken in a timely manner to safeguard and promote children's welfare.

c. We believe that every child and young person should be valued, safe and happy. We want to make sure that children and young people we have contact with know this and are empowered to tell us that they are suffering from harm.

d. We will review our child protection and safeguarding policy every year or more frequently if necessary to make sure that this policy remains relevant and effective.

1.2 Legislation and Statutory Guidance

a. This policy is based on the Department for Education's statutory guidance Keeping Children Safe in Education (2023) and Working Together to Safeguard Children (2018), and the Governance Handbook. We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

b. This policy is also based on the following legislation:
   i. Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on Academies and independent schools to safeguard and promote the welfare of students at the s school
   ii. The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
   iii. Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
   iv. Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
   v. The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
   vi. Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children
   vii. Statutory guidance on the Prevent duty, which explains Academys' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
   viii. The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
   ix. The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination; and
   x. The DfE Filtering and Monitoring Standards for Schools and Colleges

c. Where an Academy has students under the age of eight years old:
   i. The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the "2018 Childcare Disqualification Regulations") and Childcare Act 2006, which set out who is disqualified from working with children

d. Where an Academy has students within the Early Years:
   i. This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage.

e. This policy also complies with our funding agreement and articles of association.

1.3 Definitions

a. **Safeguarding** and promoting the welfare of children means:
   i. Protecting children from maltreatment
   ii. Preventing impairment of children's mental and physical health or development
   iii. Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
   iv. Taking action to enable all children to have the best outcomes

b. **Child protection** is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

c. **Abuse** is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix A explains the different types of abuse.

d. **Neglect** is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

e. **Sharing of nudes and semi-nudes** (also known as sexting or youth produced sexual imagery) is where children share nude or semi-nude images, videos or live streams.

f. **Children** includes everyone under the age of 18.

g. The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:
   i. The Local Authority (LA)
   ii. Integrated Care Boards (previously known as Clinical Commissioning Groups) for an area within the LA
   iii. The chief officer of police for a police area in the LA area

h. **Victim** is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

i. **Alleged perpetrator(s) and perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

1.4 Equality Statement

a. Some children have an increased risk of abuse, both offline and online and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

b. We give special consideration to children who:
   i. Have special educational needs (SEN) or disabilities or health conditions
   ii. Are young carers
   iii. May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
   iv. Have English as an additional language
   v. Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
   vi. Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
   vii. Are asylum seekers
   viii. Are at risk due to either their own or a family member's mental health needs
   ix. Are looked after or previously looked after
   x. Are missing from education for prolonged periods and/or repeat occasions
   xi. Whose parent/carer has expressed an intention to remove them from the Academy to be home educated.

2. ROLES AND RESPONSIBILITIES

a. Safeguarding and child protection is **everyone's** responsibility. This policy applies to all Employees, Volunteers and Governors in the Academy and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended Academy and off-site activities.

2.1 Whole Academy Preventative Education Responsibilities

a. The Academy plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment. This will be underpinned by our:
   i. Behaviour policy
   ii. Pastoral support system
   iii. Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
      - Healthy and respectful relationships
      - Boundaries and consent
      - Stereotyping, prejudice and equality
      - Body confidence and self-esteem
      - How to recognise an abusive relationship (including coercive and controlling behaviour)
      - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support

b. What constitutes sexual harassment and sexual violence and why they're always unacceptable

2.2 All Employees

a. All employees will read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually.

b. All employees will sign a declaration at the beginning of each academic year to say that they have reviewed the guidance.

c. Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)

d. Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns

e. All employees will be aware of:
   i. Our systems which support safeguarding, including this child protection and safeguarding policy, the employee code of conduct, the role and identity of the designated safeguarding lead (DSL) and [deputy/ deputies], the behaviour policy, the systems used within the Academy with regards to filtering and monitoring systems and the safeguarding response to children who go missing from education

ii. The early help process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
iii. The process for making referrals to Local Authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
iv. What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
v. The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as peer-on-peer abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation
vi. The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe.
vii. What to look for to identify children who need help or protection
viii. The fact that children can be at risk of harm inside and outside of their home, at school and online
ix. The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBTQ+) can be targeted by other children

2.3 The Designated Safeguarding Lead (DSL)

a. The DSL is a member of the senior leadership team. The DSL takes lead responsibility for child protection and wider safeguarding in the Academy.
b. When the DSL is absent, the DDSL(S) – will act as cover and will be supported by the Director of Inclusion for the City Learning Trust, who is Nathan Legg.
c. If the DSL and DDSL(s) are not available, Nathan Legg, the Director of Inclusion will act as cover for example, during out-of-Academy-hours and safeguarding issues during the Academy holidays.
d. The DSL will be given the time, funding, training, resources and support to:
   i. Provide advice and support to other employees on child welfare and child protection matters
   ii. Take part in strategy discussions and inter-agency meetings and/or support other employees to do so
   iii. Contribute to the assessment of children
   iv. Refer suspected cases, as appropriate, to the relevant body (Local Authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support employees who make such referrals directly.
   v. Have a good understanding of harmful sexual behaviour
   vi. Have a good understanding of filtering and monitoring systems and processes in place at the Academy
   vii. Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies
   viii. Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
   ix. Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search
e. The DSL will also keep the Headteacher / Principal informed of any issues, and liaise with the Local Authority case manager / investigating officers and designated officers for child protection concerns as appropriate.
f. The full responsibilities of the DSL and the DDSL(s) are set out in their job description.

2.4 The Local Governing Committee

a. The Local Governing Committee will:
   i. Facilitate a whole-Academy approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development
   ii. Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the Headteacher/Principal to account for its implementation
   iii. Appoint a senior board level (or equivalent) lead to monitor the effectiveness of this policy in conjunction with the Local Governing Committee. This is always a different person from the DSL.

b. All Governors will read Keeping Children Safe in Education in its entirety.

c. Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners

d. Ensure that the school has appropriate filtering and monitoring systems in place, and review their effectiveness. This includes:
   i. Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
   ii. Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards

e. Ensure that the DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support

f. Ensure that online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies

g. Ensure that the Academy has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors).

h. Governors will ensure that this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised

2.5 The Headteacher / Principal

a. The Headteacher / Principal is responsible for the implementation of this policy, including:
   i. Ensuring that employees (including temporary employees) and volunteers:
      - Are informed of our systems which support safeguarding, including this policy, as part of their induction
      - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect

b. Communicating this policy to parents/carers when their child joins the Academy and via the Academy website.

c. Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent.

d. Ensuring that all employees undertake appropriate safeguarding and child protection training, and updating the content of the training regularly.

e. Acting as the 'case manager / investigating officer' in the event of an allegation of abuse made against another employee or volunteer, where appropriate (see Appendix C).Make decisions regarding glow-level concerns in collaboration with the City Learning Trust HR Director and the DSL where this is appropriate.

f. Ensuring the relevant employee ratios are met, where applicable.

g. Making sure each child in the Early Years Foundation Stage is assigned a key person.

h. Overseeing the safe use of technology, mobile phones and cameras within Early Years settings.

2.6 The Virtual School Headteacher/Principal

a. Virtual school heads have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker.

b. They should also identify and engage with key professionals, e.g. DSLs, special educational needs co-ordinators (SENCOs), social workers, mental health leads and others.

c. The Academy with engage with Virtual School Headteachers for both Stoke-on-Trent and Staffordshire when a child is looked after or previously looked after. Where a child has recently moved to the area, the Academy will liaise with the Virtual School Headteacher in the Local Authority that the child previously resided in.

3. CONFIDENTIALITY

a. Whilst professionals should in general discuss any concerns with the child, their parents / carers and where possible seek their agreement to making referrals to Children's Advice and Duty Service (CHAD), this should only be done where such discussion and agreement-seeking will not place the child or others at increased risk of suffering significant harm. Consent / agreement is not required for Child Protection referrals; however, the referring professional, would need to, where possible discuss with and inform parents or carers that you are making a referral as stated above, unless by alerting them you could be putting that child or others at risk:

   i. Timely information sharing is essential to effective safeguarding

   ii. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children

   iii. The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe

   iv. If employees need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk

   v. Employees should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests

b. Regarding anonymity, all staff will:

   i. Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system

   ii. Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved

   iii. Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities

c. The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support employees who have to make decisions about sharing information

d. If employees are in any doubt about sharing information, they should speak to the Designated Safeguarding Lead (or Deputy).

c. If there are concerns about a data breach, or potential data breach where information relating to the safeguarding of a child has been shared, or the information shared places the child at risk of harm, the DSL (or deputy) must immediately inform Nathan Legg and Sharon Bates.

4. RECOGNISING ABUSE AND TAKING ACTION

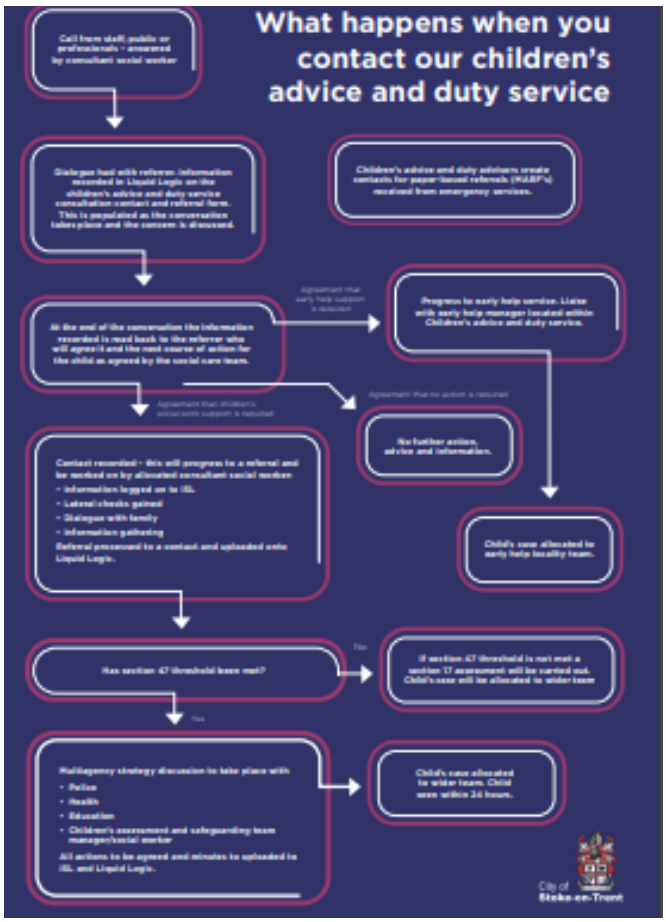
a. Employees, volunteers and Governors must follow the procedures set out below in the event of a safeguarding issue.

4.1 If a child is suffering or likely to suffer harm, or immediate danger

a. Make a referral to children's social care and/or the police immediately if you believe a child is suffering or likely to suffer from harm, or is in immediate danger. Anyone can make a referral.

b. Tell the DSL or DDSL (see section 5.2) as soon as possible if you make a referral directly.

c. The Children's Advice and Duty Service (CHAD), operate child protection and safeguarding referrals for children and young people in Stoke-on-Trent. They can be contacted on 01782 235100 (Monday to Friday 8.30am to 6pm). If the concern needs to be referred to CHAD out of hours, then the emergency duty team can be contacted on 01782 234234.



4.2 If a child makes a disclosure to you

a. If a child discloses a safeguarding issue to you, you should:

i. Listen to and believe them. Allow them time to talk freely and do not ask leading questions. If you do ask questions, use the TED questions to support

ii. Stay calm and do not show that you are shocked or upset

iii. Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner

iv. Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret

v. Type up your conversation as soon as possible in the child's own words, using CPOMS. Stick to the facts, and do not put your own judgement on it

vi. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process.

4.3 If you discover that FGM has taken place or a student is at risk of FGM

a. Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

b. FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

c. Possible indicators that a student has already been subjected to FGM, and factors that suggest a student may be at risk, are set out in Appendix D of this policy.

d. **Any teacher** who either:
   i. Is informed by a girl under 18 that an act of FGM has been carried out on her; or
   ii. Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

c. Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.

d. **Any other member or employee** who discovers that an act of FGM appears to have been carried out on a **student under 18** must speak to the DSL and follow our local safeguarding procedures.

e. The duty for teachers mentioned above does not apply in cases where a student is **at risk** of FGM or FGM is suspected but is not known to have been carried out. **Employees should not examine students.**

f. **Any employee** who suspects a student is **at risk** of FGM or suspects that FGM has been carried out must speak to the DSL and follow our local safeguarding procedures.

4.4 If you have concerns about a child

(as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

a. Figure 1 below, illustrates the procedure to follow if you have any concerns about a child's welfare.

b. Where possible, speak to the DSL first to agree a course of action.

c. If in exceptional circumstances the DSL or DDSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team, the Director of Inclusion for the City Learning Trust and/or take advice from Local Authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible. Make a referral to Local Authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

4.4.1 Early Help

a. If early help is appropriate, the DSL (or a nominated member of the Pastoral/Safeguarding Team) will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Employees may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

b. The DSL will keep the case under constant review and the Academy will consider a referral to Local Authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

c. Any child may benefit from early help, but all Academy and college employees should be particularly alert to the potential need for early help for a child who:
   i. Is disabled or has certain health conditions and has specific needs
   ii. Has SEND (with or without an EHCP)
   iii. Has a mental health need
   iv. Is a young carer
   v. Is showing signs of being drawn into anti-social behaviour, including gang involvement and association with organised crime or county lines
   vi. Frequent missing episodes from home or from care;
   vii. Risk of modern slavery, trafficking, sexual or criminal exploitation

viii. Is at risk of being radicalised or exploited;
ix. Has a family member in prison, or is affected by parental offending
x. Is in a family circumstance presenting challenging for the child, such as drug / alcohol misuse, adult mental health issues and domestic abuse
xi. Misuses substances themselves
xii. Has returned home from their family from care;
xiii. Is a risk of 'honour' based abuse, such as FGM or Forced Marriage
xiv. Is privately fostered; or
xv. Is persistently absent from education, including persistent absences for part of the school day.

4.4.2 Referral

a. If it is appropriate to refer the case to Local Authority children's social care or the police, the DSL will make the referral or support you to do so.

b. If you make a referral directly (see section 4.1), you must tell the DSL as soon as possible.

c. The Local Authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the Local Authority if this information is not made available, and ensure outcomes are properly recorded.

d. If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves. The local arrangements for escalation can be found here: https://safeguardingchildren.stoke.gov.uk/homepage/16/resources and click 'escalation policy'.

4.5 If you have concerns about extremism

a. If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL or DDSL first to agree a course of action.

b. If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team, the Director of Inclusion and/or seek advice from Local Authority children's social care. Make a referral to Local Authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

c. Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include Channel, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the Local Authority children's social care team.

d. The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which Academy Employees and Governors can call to raise concerns about extremism with respect to a student. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

e. In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:
   i. Think someone is in immediate danger
   ii. Think someone may be planning to travel to join an extremist group
   iii. See or hear something that may be terrorist-related.

4.6 If you have a mental health concern

a. Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

b. Employees will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

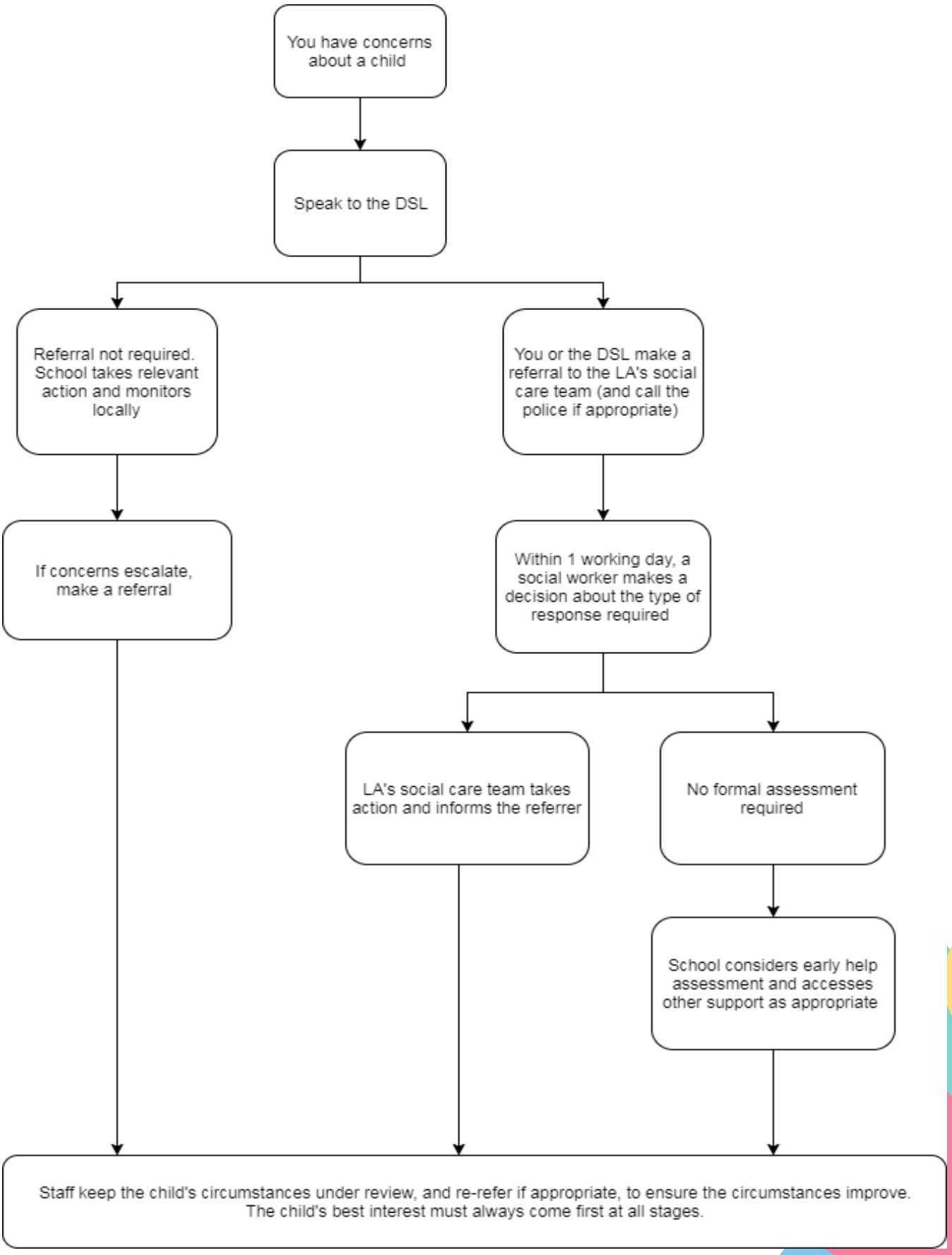
c. If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 4.4.

d. If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action. The Academy has links with the local CAMHS services and Younger Mind Counsellors are available in each Academy. The DSL / DDSL will be aware of how to refer to these services.

4.7 Figure 1: procedure if you have concerns about a child's welfare

(as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)

Note: if the DSL is unavailable, this should not delay action. See section 4.4 for what to do.



4.8 Concerns about an employee, supply teacher, volunteer or contractor

a. If you have concerns about an employee (including a supply teacher, volunteer or contractor), or an allegation is made about an employee (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the Headteacher / Principal as soon as possible. If the concerns/allegations are about the Headteacher / Principal, speak to a member of the City Learning Trust Executive Team (Sian Hughes, Sharon Bates and Carl Ward).

b. The Headteacher/Principal/Executive Team Member will then follow the procedures set out in Appendix C, if appropriate.

c. Where you believe there is a conflict of interest in reporting a concern or allegation about an employee (including a supply teacher, volunteer or contractor) to the Headteacher/Principal, report it directly to the Local Authority designated officer (LADO).

d. Where appropriate, the Academy will inform Ofsted of the allegation and actions taken, within the necessary timescale (see Appendix C for more detail).

e. If you receive an allegation relating to an incident where an individual or organisation was using the Academy premises for running an activity for children, follow our school safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation.

4.9 Allegations of abuse made against other students (child-on-child abuse)

a. We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up", as this can lead to a culture of unacceptable behaviours and an unsafe environment for students.

b. We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

c. Most cases of students hurting other students will be dealt with under our Academy behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:
   i. Is serious, and potentially a criminal offence
   ii. Could put students in the Academy at risk
   iii. Is violent
   iv. Involves students being forced to use drugs or alcohol
   v. Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

d. See Appendix D for more information about child-on-child abuse.

4.9.1 Procedures for dealing with allegations of child-on-child abuse

a. If a student makes an allegation of abuse against another student:
   i. You must record the allegation using CPOMS and tell the DSL, but do not investigate it
   ii. The DSL will contact the Local Authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
   iii. The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed
   iv. The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate and consider any Younger Mind counselling where this is appropriate.

4.9.2 Creating a supportive environment in the Academy and minimising the risk of child-on-child

a. We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

b. To achieve this, we will:

i. Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
ii. Be vigilant to issues that particularly affect different genders – e.g., sexualised or aggressive touching or grabbing towards female students, and initiation or hazing type violence with respect to boys
iii. Ensure our curriculum helps to educate students about appropriate behaviour and consent
iv. Ensure students are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below)
v. Ensure employees reassure victims that they are being taken seriously

c. Ensure employees are trained to understand:
i. How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
ii. That even if there are no reports of peer-on-peer abuse in the Academy, it does not mean it is not happening – employees should maintain an attitude of "it could happen here"
iii. That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
- Children can show signs or act in ways they hope adults will notice and react to
- A friend may make a report
- An employee may overhear a conversation
- A child's behaviour might indicate that something is wrong

iv. That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
v. That a student harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
vi. The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
vii. That they should speak to the DSL if they have any concerns
viii. That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side
ix. The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

d. Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our Academy from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:
i. Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or local authority children's social care to determine this
ii. There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

4.10 Sharing of nudes and semi-nudes ('sexting')

4.10.1 Employee responsibilities when responding to an incident

a. If an employee or visitor to the Academy has been made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), employees and/or visitors to the Academy must report it to the DSL immediately.

b. You must **not**:
i. View, copy, print, share, store or save the imagery yourself, or ask a student to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
ii. Delete the imagery or ask the student to delete it
iii. Ask the student(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
iv. Share information about the incident with other members of employees, the student(s) it involves or their, or other, parents and/or carers
v. Say or do anything to blame or shame any young people involved

c. You should explain that you need to report the incident, and reassure the student(s) that they will receive support and help from the DSL.

4.10.2 Initial review meeting

a. Following a report of an incident, the DSL will hold an initial review meeting with appropriate Academy employees – this may include the employee who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:
   i. Whether there is an immediate risk to student(s)
   ii. If a referral needs to be made to the police and/or children's social care
   iii. What further information is required to decide on the best response
   iv. Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
   v. Whether immediate action should be taken to delete or remove images or videos from devices or online services
   vi. Any relevant facts about the students involved which would influence risk assessment
   vii. If there is a need to contact another Academy, college, setting or individual
   viii. Whether to contact parents or carers of the students involved (in most cases parents/carers should be involved)

b. The DSL will make an immediate referral to police and/or children's social care if:
   i. The incident involves an adult
   ii. There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
   iii. What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
   iv. The imagery involves sexual acts and any student in the images or videos is under 13
   v. The DSL has reason to believe a student is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

c. If none of the above apply then the DSL, in consultation with the Headteacher / Principal and other employees as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

4.10.3 Further review by the DSL

a. If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.

b. They will hold interviews with the students involved (if appropriate).

c. If at any point in the process there is a concern that a student has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

4.10.4 Informing Parents/Carers

a. The DSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the student at risk of harm.

4.10.5 Referring to the police

a. If it is necessary to refer an incident to the police, this will be done by dialling Staffordshire Police on 101.

4.10.6 Recording incidents

a. All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded using CPOMS. The record-keeping arrangements set out in section 14 of this policy also apply to recording these incidents.

4.10.7 Curriculum coverage

a. Students are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our relationships education / relationships and sex education and computing programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:
   i. What it is
   ii. How it is most likely to be encountered

iii. The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment
iv. Issues of legality
v. The risk of damage to people's feelings and reputation

b. Students also learn the strategies and skills needed to manage:
i. Specific requests or pressure to provide (or forward) such images
ii. The receipt of such images

c. This policy on the sharing of nudes and semi-nudes is also shared with students so they are aware of the processes the Academy will follow in the event of an incident.

4.11 Reporting systems for our students

a. Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

b. We recognise the importance of ensuring students feel safe and comfortable to come forward and report any concerns and/or allegations.

c. To achieve this, we will:
i. Put systems in place for students to confidently report abuse
ii. Ensure our reporting systems are well promoted, easily understood and easily accessible for students
iii. Make it clear to students that their concerns will be taken seriously, and that they can safely express their views and give feedback

5. ONLINE SAFETY AND THE USE OF MOBILE TECHNOLOGY

a. We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

b. To address this, our Academy aims to:
i. Have robust processes (including filtering and monitoring) in place to ensure the online safety of students, employees, volunteers and Governors
ii. Protect and educate the whole Academy community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
iii. Set clear guidelines for the use of mobile phones for the whole Academy community
iv. Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

5.1 The 4 key categories of risk

a. Our approach to online safety is based on addressing the following categories of risk:
i. **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism
ii. **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
iii. **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
iv. **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

b. **To meet our aims and address the risks above we will:**
i. Educate students about online safety as part of our curriculum. For example:
- The safe use of social media, the internet and technology
- Keeping personal information private
- How to recognise unacceptable behaviour online

- How to report any incidents of cyber-bullying, ensuring students are encouraged to do so, including where they are a witness rather than a victim

c. Train employees, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation and the roles and responsibilities around filtering and monitoring. All employees will receive refresher training at least once each academic year.

d. Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety.

e. Make sure employees are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
   i. Employees are allowed to bring their personal phones to the Academy for their own use, but will limit such use to non-contact time when students are not present
   ii. Employees will not take pictures or recordings of students on their personal phones or cameras

f. Make all students, parents/carers, employees, volunteers and Governors aware that they are expected to sign an agreement regarding the acceptable use of the internet within the Academy, use of the Academy's ICT systems and use of their mobile and smart technology.

g. Explain the sanctions we will use if a student is in breach of our policies on the acceptable use of the internet and mobile phones.

h. Make sure all employees, students and parents/carers are aware that employees have the power to search students' phones, as set out in the DfE's guidance on searching, screening and confiscation .

i. Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the Academy IT systems.

6. ARTIFICIAL INTELLIGENCE (AI)

a. Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Bard.

b. The Academy recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose pupils to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

c. The Academy will treat any use of AI to access harmful content or bully pupils in line with this policy and our behaviour and anti-bullying policy.

d. Staff should be aware of the risks of using AI tools whilst they are still being developed and should carry out risk assessments for any new AI tool being used by the Academy, in conjunction with the IT Director for the City Learning Trust.

7. NOTIFYING PARENTS OR CARERS

a. Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure.

b. Other employees will only talk to parents or carers about any such concerns following consultation with the DSL.

c. If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the Local Authority children's social care team before doing so.

d. In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved.

7. STUDENTS WITH SPECIAL EDUCATIONAL NEEDS, DISABILITIES OR HEALTH ISSUES

a. We recognise that students with special educational needs (SEN) or disabilities or certain health conditions can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:
   i. Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
   ii. Students being more prone to peer group isolation or bullying (including prejudice-based bullying) than other students
   iii. The potential for students with SEN, disabilities or certain health conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs
   iv. Communication barriers and difficulties in managing or reporting these challenges

b. We offer extra pastoral support for these students. This includes:
   i. 1:1 mentoring
   ii. Group SEMH sessions
   iii. Younger Mind Counselling
   iv. NHS trailblazers in the case where Academies have access to this service.

8. STUDENTS WITH A SOCIAL WORKER

a. Students may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

b. The DSL and all employees will work with and support social workers to help protect vulnerable children.

c. Where we are aware that a student has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the student's safety, welfare and educational outcomes. For example, it will inform decisions about:
   i. Responding to unauthorised absence or missing education where there are known safeguarding risks
   ii. The provision of pastoral and/or academic support

9. LOOKED-AFTER AND PREVIOUSLY LOOKED-AFTER CHILDREN

a. We will ensure that employees have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:
   i. Appropriate employees have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
   ii. The DSL has details of children's social workers and relevant virtual school heads

b. We have appointed a designated teacher, who is also the DSL, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.

c. The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

d. As part of their role, the designated teacher will:
   i. ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
   ii. Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how student premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans

10. COMPLAINTS AND CONCERNS ABOUT ACADEMY SAFEGUARDING POLICIES

10.1 Complaints against employees

a. Complaints against employees that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against employees (see Appendix C).

10.2 Other Complaints

a. For complaints relating to matters that are not child protection or safeguarding concerns, please refer to the City Learning Trust complaints policy.

10.3 Whistle-blowing

a. The City Learning Trust has a policy for Whistle-blowing procedures it contains details on:
   i. What areas of malpractice or wrongdoing are covered by the procedures
   ii. The options available for reporting a concern, including who to approach within the Academy and externally
   iii. How the Academy will respond to such concerns
   iv. What protection is available to employees who report another employee

11. RECORD KEEPING

a. We will hold records in line with our records retention schedule.

b. All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded using CPOMS. If in any doubt about whether to record something, discuss it with the DSL.

c. Records will include:
   i. A clear and comprehensive summary of the concern
   ii. Details of how the concern was followed up and resolved
   iii. A note of any action taken, decisions reached and the outcome

d. Concerns and referrals will be kept in a separate child protection file for each child.

e. Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

f. Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the Academy.

g. Safeguarding records which contain information about allegations of sexual abuse will be retained for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry.

h. If a child for whom the Academy has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main file. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

i. In addition:
   i. Appendix B sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks
   ii. Appendix C sets out our policy on record-keeping with respect to allegations of abuse made against employees

12. TRAINING

12.1 All Employees

a. All employees will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and online safety, to ensure they understand the Academy's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect.

b. This training will be regularly updated and will:

   i. Be integrated, aligned and considered as part of the whole-Academy safeguarding approach and wider staff training, and curriculum planning

   ii. Be in line with advice from the 3 safeguarding partners

   iii. Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring

   iv. Have regard to the Teachers' Standards to support the expectation that all teachers:

   - Manage behaviour effectively to ensure a good and safe environment
   - Have a clear understanding of the needs of all students

c. All employees will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

d. Employees will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins and staff meetings).

e. Volunteers will receive appropriate training, if applicable.

12.2 The DSL and DDSL(s)

a. The DSL and [deputy/deputies] will undertake child protection and safeguarding training appropriate to their role and in line with DfE and local guidance.

b. In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

c. They will also undertake Prevent awareness training.

12.3 Governors

a. All Governors receive training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.

b. As the Chair of Governors may be required to act as the 'case manager / investigating officer' in the event that an allegation of abuse is made against the Headteacher/Principal, they receive training in managing allegations for this purpose.

12.4 Recruitment – interview panels

a. At least one person conducting any interview for any post at the Academy will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

13. MONITORING ARRANGEMENTS

a. The policy will be reviewed annually in September each year and updated in line with the most recent Keeping Children Safe in Education and Working Together to Safeguard Children guidance, as appropriate. At every review, it will be approved by the Board of Trustees. If required between 1st September and the first meeting of the Board of Trustees, Chair's powers will be used to approve the policy as a live document.

14. LINKS WITH OTHER POLICIES

a. This policy links to the following policies and procedures:

Behaviour	Prevent	Relationships & Sex Education	Early Years Personal Care
Code of Conduct (Employee)	E-Safety	First Aid	Anti-Bullying
Designated Teacher for LAC	Alcohol & Substance Misuse (Students)	Visitor Behaviour	Separated Parents
Safer Recruitment	Positive Handling	EVOLVE Risk Assessments	Whistleblowing
Health & Safety	Equality & Diversity	Visitors to Academy	Separated Parents

15. APPENDICES

a. These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education.

APPENDIX A: TYPES OF ABUSE

a. Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

b. Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

c. Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

d. Emotional abuse may involve:
   - Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.
   - Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.
   - Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction.
   - Seeing or hearing the ill-treatment of another.
   - Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

e. Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:

f. Physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.

g. Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet).

h. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

i. Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

j. Once a child is born, neglect may involve a parent or carer failing to:
   - Provide adequate food, clothing and shelter (including exclusion from home or abandonment).
   - Protect a child from physical and emotional harm or danger.
   - Ensure adequate supervision (including the use of inadequate care-givers).
   - Ensure access to appropriate medical care or treatment.

APPENDIX B: SAFER RECRUITMENT AND DBS CHECKS

B.1 Recruitment and selection process

a. To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of employees to work with children have received appropriate safer recruitment training.

b. We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

B.2 Advertising

a. When advertising roles, we will make clear:
   i. Our Academy commitment to safeguarding and promoting the welfare of children
   ii. That safeguarding checks will be undertaken
   iii. The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
   iv. That we will conduct online search
   v. Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account
   vi. All documentation relating to the applicants will be treated confidentially and in accordance with the Trust's Data Protection and Retention Policies.

B.3 Application Forms

a. Our application forms will:
   i. Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
   ii. Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders

B.4 Shortlisting

a. Our shortlisting process will involve at least 2 people and will:
   i. Consider any inconsistencies and look for gaps in employment and reasons given for them
   ii. Explore all potential concerns

b. Once we have shortlisted candidates, we will ask shortlisted candidates to:
   i. Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
      - If they have a criminal history
      - Whether they are included on the barred list
      - Whether they are prohibited from teaching
      - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
      - Any relevant overseas information
   ii. Sign a declaration confirming the information they have provided is true

B.5 Seeking references and checking employment history

a. We will obtain references before interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

b. When seeking references, we will:
   i. Not accept open references
   ii. Liaise directly with referees and verify any information contained within references with the referees

iii. Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the Headteacher/ Principal as accurate in respect to disciplinary investigations
iv. Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
v. Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children
vi. Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
vii. Resolve any concerns before any appointment is confirmed

B.6 Interview and Selection

a. When interviewing candidates, we will:
   i. Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
   ii. Explore any potential areas of concern to determine the candidate's suitability to work with children
   iii. Record all information considered and decisions made

B.7 Pre-appointment vetting checks

a. We will record all information on the checks carried out in the Academy's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

b. Where appropriate, we will use internet searches in line with our safer recruitment policy.

B.8 New employees

a. All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new employees, we will:
   i. Verify their identity
   ii. Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
   iii. Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
   iv. Verify their mental and physical fitness to carry out their work responsibilities
   v. Verify their right to work in the UK. We will keep a copy of this verification for the duration of the employee's employment and for 2 years afterwards
   vi. Verify their professional qualifications, as appropriate
   vii. Ensure they are not subject to a prohibition order if they are employed to be a teacher
   viii. Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. Where available, these will include:
      - For all employees, including teaching positions: criminal records checks for overseas applicants
      - For teaching positions: obtaining a letter of professional standing from the professional regulating authority in the country where the applicant has worked
   ix. Check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the Secretary of State

b. Management positions are most likely to include, but are not limited to, Headteachers, Principals and Deputy/ Assistant Headteachers/Principals.

c. We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a

record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

d. Regulated activity means a person who will be:
   i. Responsible, on a regular basis in an Academy or college, for teaching, training, instructing, caring for or supervising children; or
   ii. Carrying out paid, or unsupervised unpaid, work regularly in an Academy or college where that work provides an opportunity for contact with children; or
   iii. Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

B.9 Agency and third-party Employee

a. We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

B.10 Trainee/student teachers

a. Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

b. Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

c. In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

B.11 Volunteers

a. We will:
   i. Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
   ii. Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
   iii. Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment
   iv. Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought

B.12 Governors

a. All Trustees and Local Governing Committee members will have an enhanced DBS check without barred list information.

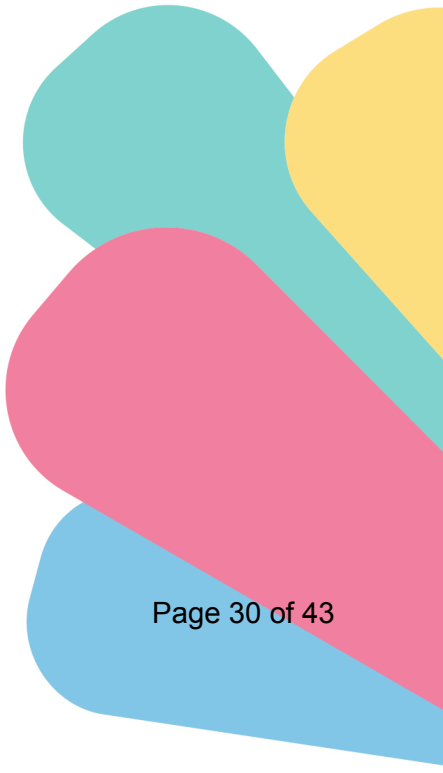
b. They will have an enhanced DBS check with barred list information if working in regulated activity.

c. The Chair of the Board will have their DBS check countersigned by the Secretary of State.

d. All proprietors, trustees and Local Governing Committee will also have the following checks:
   i. A section 128 check (to check prohibition on participation in management under section 128 of the Education and Skills Act 2008). [Section 128 checks are only required for Local Governing Committee if they have retained or been delegated any management responsibilities.]
   ii. Identity
   iii. Right to work in the UK
   iv. Other checks deemed necessary if they have lived or worked outside the UK

B.13 Employees working in alternative provision settings

a. Where we place a student with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.



APPENDIX C: ALLEGATIONS OF ABUSE MADE AGAINST EMPLOYEES

C1: Allegations that may meet the harms threshold

a. This section applies to all cases in which it is alleged that a current employee, including a supply teacher, volunteer or contractor, has:
   i. Behaved in a way that has harmed a child, or may have harmed a child, and/or
   ii. Possibly committed a criminal offence against or related to a child, and/or
   iii. Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or
   iv. Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of the Academy

b. We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

c. A 'case manager / investigating officer' will lead any investigation. Where the Headteacher / Principal is the subject of the allegation, the case manager / investigating officer will be identified at the earliest opportunity.

d. Our procedures for dealing with allegations will be applied with common sense and judgement.

C.1.1 Suspension of the accused until the case is resolved

a. Suspension of the accused will not be the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

b. Based on an assessment of risk, we will consider alternatives such as:
   i. Redeployment within the Academy so that the individual does not have direct contact with the child or children concerned
   ii. Providing an assistant to be present when the individual has contact with children
   iii. Redeploying the individual to alternative work in the Academy so that they do not have unsupervised access to children
   iv. Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted
   v. Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the City Learning Trust.

c. If in doubt, the case manager / investigating officer will seek views from the Trust HR Director and the designated officer at the Local Authority, as well as the police and children's social care where they have been involved.

C.1.2 Definitions for outcomes of allegation investigations

a. **Substantiated:** there is sufficient evidence to prove the allegation.

b. **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation.

c. **False:** there is sufficient evidence to disprove the allegation.

d. **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence).

e. **Unfounded**: to reflect cases where there is no evidence or proper basis which supports the allegation being made.

C.1.3 Procedure for dealing with allegations

a. In the event of an allegation that meets the criteria above, the case manager / investigating officer will take the following steps:
   i. Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below

ii. Discuss the allegation with the designated officer at the Local Authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/ or children's social care services. (The case manager / investigating officer may, on occasion, consider it necessary to involve the police before consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager / investigating officer will notify the designated officer as soon as practicably possible after contacting the police)

iii. Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager / investigating officer will only share such information with the individual as has been agreed with those agencies

iv. Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the Academy is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/ or children's social care services, as appropriate

v. Where the case manager / investigating officer is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care

vi. **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the Academy and their contact details

vii. **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation

viii. **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in the Academy and/or liaise with the police and/or children's social care services as appropriate

ix. Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.

x. Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager / investigating officer will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice

xi. Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the employee)

xii. Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

xiii. We will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

b. If the Academy is made aware that the Secretary of State has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

c. Where the police are involved, wherever possible the Academy will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the Academy's disciplinary process, should this be required at a later point.

C.1.4 Additional considerations for supply teachers and all contracted employees

a. If there are concerns or an allegation is made against someone not directly employed by the Academy, such as a supply teacher or contracted employee provided by an agency, we will take the actions below in addition to our standard procedures.
   i. We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
   ii. The Local Governing Committee will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the Academy, while the Academy carries out the investigation
   iii. We will involve the agency fully, but the Academy will take the lead in collecting the necessary information and providing it to the LADO as required
   iv. We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)
b. When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

C.1.5 Timescales

a. We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:
   i. Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week
   ii. If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
   iii. If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days
b. However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

C.2 Specific actions

C.2.1 Action following a criminal investigation or prosecution

a. The case manager / investigating officer will discuss with the Local Authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

C.2.2 Conclusion of a case where the allegation is substantiated

a. If the allegation is substantiated and the individual is dismissed or the Academy ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the Academy will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.
b. If the individual concerned is a member of teaching staff, the Academy will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

C.2.3 Individuals returning to work after suspension

a. If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager / investigating officer will consider how best to facilitate this.
b. The case manager / investigating officer will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the Academy.

C.2.4 Unsubstantiated, unfounded, false or malicious reports

a. If a report is:
   i. Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
   ii. Shown to be deliberately invented, or malicious, the Academy will consider whether any disciplinary action is appropriate against the individual(s) who made it

C.2.5 Unsubstantiated, unfounded, false or malicious allegations

a. If an allegation is:
   i. Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager / investigating officer will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
   ii. Shown to be deliberately invented, or malicious, the Academy will consider whether any disciplinary action is appropriate against the individual(s) who made it

C.2.6 Confidentiality and information sharing

a. The Academy will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

b. The case manager / investigating officer will take advice from the LADO, police and children's social care services, as appropriate, to agree:
   i. Who needs to know about the allegation and what information can be shared
   ii. How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
   iii. What, if any, information can be reasonably given to the wider community to reduce speculation
   iv. How to manage press interest if, and when, it arises

C.2.7 Record-keeping

a. The case manager / investigating officer will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.

b. The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

c. For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:
   i. A clear and comprehensive summary of the allegation
   ii. Details of how the allegation was followed up and resolved
   iii. Notes of any action taken, decisions reached and the outcome
   iv. A declaration on whether the information will be referred to in any future reference

d. In these cases, the Academy will provide a copy to the individual, in agreement with children's social care or the police as appropriate.

e. Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

C.2.8 References

a. When providing employer references, we will:
   i. Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious
   ii. Include substantiated allegations, provided that the information is factual and does not include opinions

C.3 Section 2: concerns that do not meet the harm threshold

a. This section applies to all concerns (including allegations) about an employee, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

b. Concerns may arise through, for example:
   i. Suspicion
   ii. Complaint
   iii. Disclosure made by a child, parent or other adult within or outside the Academy
   iv. Pre-employment vetting checks

c. We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

C.3.1 Definition of low-level concerns

a. The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the Academy may have acted in a way that:
   i. Is inconsistent with the employee code of conduct, including inappropriate conduct outside of work, **and**
   ii. Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the Local Authority

b. Examples of such behaviour could include, but are not limited to:
   i. Being overly friendly with children
   ii. Having favourites
   iii. Taking photographs of children on their mobile phone
   iv. Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
   v. Using inappropriate sexualised, intimidating or offensive language

C.3.2 Sharing low-level concerns

a. We recognise the importance of creating a culture of openness, trust and transparency to encourage all employees to share low-level concerns so that they can be addressed appropriately.

b. We will create this culture by:
   i. Ensuring employees are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
   ii. Empowering employees to share any low-level concerns as per section 7.7 of this policy
   iii. Empowering employees to self-refer
   iv. Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
   v. Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
   vi. Helping to identify any weakness in the Academy's safeguarding system

C.3.3 Responding to low-level concerns

a. If the concern is raised via a third party, the Headteacher / Principal will collect evidence where necessary by speaking:
   i. Directly to the person who raised the concern, unless it has been raised anonymously
   ii. To the individual involved and any witnesses

b. The Headteacher / Principal will use the information collected to categorise the type of behaviour and determine any further action, in line with the Academy Code of Conduct.

C.3.4 Record keeping

a. All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

b. Records will be:
   i. Kept confidential, held securely and comply with the DPA 2018 and UK GDPR

ii. Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the Local Authority

c. Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

C.3.5 References

a. We will not include low-level concerns in references unless:
   i. The concern (or group of concerns) has met the threshold for referral to the designated officer at the Local Authority and is found to be substantiated; and/or
   ii. The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

APPENDIX D: SPECIFIC SAFEGUARDING ISSUES

D1: Child abduction and community safety incidents

a. Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.

b. Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

c. As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff.

d. As a part of the Academies RSHE curriculum, we will focus on buildings children's confidence and abilities in addition to warning them about strangers.

D2: Children missing from education

a. A child going missing from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

b. There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:
   i. Are at risk of harm or neglect
   ii. Are at risk of forced marriage or FGM
   iii. Come from Gypsy, Roma, or Traveller families
   iv. Come from the families of service personnel
   v. Go missing or run away from home or care
   vi. Are supervised by the youth justice system
   vii. Cease to attend a school
   viii. Come from new migrant families

c. We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the Local Authority if a child leaves the Academy without a new school being named, and adhering to requirements with respect to sharing information with the Local Authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

d. Employees will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.

e. If an employee suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the Local Authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

D3: Child criminal exploitation

a. Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

b. The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

c. The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

   i. Indicators of CCE can include a child:
   ii. Appearing with unexplained gifts or new possessions
   iii. Associating with other young people involved in exploitation
   iv. Suffering from changes in emotional wellbeing
   v. Misusing drugs and alcohol
   vi. Going missing for periods of time or regularly coming home late
   vii. Regularly missing school or education
   viii. Not taking part in education
   ix. have older boyfriends or girlfriends; and
   x. suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant

d. If an employee suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the Local Authority's children's social care team and the police, if appropriate.

D4: Child sexual exploitation

a. Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

b. The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

c. The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

d. CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

e. In addition to the CCE indicators above, indicators of CSE can include a child:

   i. Having an older boyfriend or girlfriend
   ii. Suffering from sexually transmitted infections or becoming pregnant

f. If an employee suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the Local Authority's children's social care team and the police, if appropriate.

D5: Domestic abuse

a. Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

b. Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home.

c. Older children may also experience domestic abuse and/or violence in their own personal relationships.

d. Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children.

e. If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in the Academy (usually the designated safeguarding lead) before the child or children arrive at the Academy the following day. This is the procedure where police forces are part of Operation Encompass – all City Learning Trust Academies are a part of 'Operation Encompass'.

f. The DSL will provide support according to the child's needs and update records about their circumstances.

D6: Homelessness

a. Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

b. The DSL and deputy/deputies will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

c. Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

D7: So-called 'honour-based' abuse (including FGM and forced marriage)

a. So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

b. Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

c. All forms of HBA are abuse and will be handled and escalated as such. All employees will be alert to the possibility of a child being at risk of HBA or already having suffered it. If employees have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

D8: FGM

a. The DSL will make sure that employees have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

b. Section 7.3 of this policy sets out the procedures to be followed if an employee discovers that an act of FGM appears to have been carried out or suspects that a student is at risk of FGM.

   i. Indicators that FGM has already occurred include:
   ii. A student confiding in a professional that FGM has taken place
   iii. A mother/family member disclosing that FGM has been carried out
   iv. A family/student already being known to social services in relation to other safeguarding issues
   v. A girl:
      - Having difficulty walking, sitting or standing, or looking uncomfortable
      - Finding it hard to sit still for long periods of time (where this was not a problem previously)
      - Spending longer than normal in the bathroom or toilet due to difficulties urinating
      - Having frequent urinary, menstrual or stomach problems
      - Avoiding physical exercise or missing PE
      - Being repeatedly absent from Academy, or absent for a prolonged period
      - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
      - Being reluctant to undergo any medical examinations
      - Asking for help, but not being explicit about the problem
      - Talking about pain or discomfort between her legs

c. Potential signs that a student may be at risk of FGM include:

   i. The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
   ii. FGM being known to be practised in the girl's community or country of origin
   iii. A parent or family member expressing concern that FGM may be carried out

iv. A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues

d. A girl:
   i. Having a mother, older sibling or cousin who has undergone FGM
   ii. Having limited level of integration within UK society
   iii. Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
   iv. Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
   v. Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
   vi. Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
   vii. Being unexpectedly absent from the Academy
   viii. Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

e. The above indicators and risk factors are not intended to be exhaustive.

D9: Forced marriage

a. Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

b. Employees will receive training around forced marriage and the presenting symptoms. We are aware of the 'one chance' rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them.

c. If an employee suspects that a student is being forced into marriage, they will speak to the student about their concerns in a secure and private place. They will then report this to the DSL.

d. The DSL will:
   i. Speak to the student about the concerns in a secure and private place
   ii. Activate the local safeguarding procedures and refer the case to the Local Authority's designated officer
   iii. Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fco.gov.uk
   iv. Refer the student to an education welfare officer, pastoral tutor, learning mentor, or Academy counsellor, as appropriate

D10: Preventing radicalisation

a. Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

b. Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

c. Terrorism is an action that:
   i. Endangers or causes serious violence to a person/people;
   ii. Causes serious damage to property; or
   iii. Seriously interferes or disrupts an electronic system
   iv. The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

d. Academies have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that employees have access to appropriate training to equip them to identify children at risk.

e. We will assess the risk of children in our Academies being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

f. We will ensure that suitable internet filtering is in place, and equip our students to stay safe online at school and at home.

g. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

h. Employees will be alert to changes in students' behaviour.

i. The government website Educate Against Hate and charity NSPCC say that signs that a student is being radicalised can include:
   i. Refusal to engage with, or becoming abusive to, peers who are different from themselves
   ii. Becoming susceptible to conspiracy theories and feelings of persecution
   iii. Changes in friendship groups and appearance
   iv. Rejecting activities they used to enjoy
   v. Converting to a new religion
   vi. Isolating themselves from family and friends
   vii. Talking as if from a scripted speech
   viii. An unwillingness or inability to discuss their views
   ix. A sudden disrespectful attitude towards others
   x. Increased levels of anger
   xi. Increased secretiveness, especially around internet use
   xii. Expressions of sympathy for extremist ideologies and groups, or justification of their actions
   xiii. Accessing extremist material online, including on Facebook or Twitter
   xiv. Possessing extremist literature
   xv. Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

j. Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – employees should have confidence in their instincts and seek advice if something feels wrong.

k. If employees are concerned about a student, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

l. Employees should **always** take action if they are worried.

D.11 Child-on-child abuse

a. Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of the Academy and online.

b. Child-on-child abuse is most likely to include, but may not be limited to:
   i. Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
   ii. Abuse in intimate personal relationships between peers
   iii. Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
   iv. Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
   v. Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
   vi. Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
   vii. Consensual and non-consensual sharing of nudes and semi nudes images and/or videos (also known as sexting or youth produced sexual imagery)

viii. Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm

ix. Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

c. Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

d. If employees have any concerns about peer-on-peer abuse, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our Academies approach to this type of abuse.

D.12 Sexual violence and sexual harassment between children in schools

a. Sexual violence and sexual harassment can occur:

i. Between 2 children of any age and sex

ii. Through a group of children sexually assaulting or sexually harassing a single child or group of children

b. Online and face to face (both physically and verbally)

c. Sexual violence and sexual harassment exist on a continuum and may overlap.

d. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same Academy.

e. If a victim reports an incident, it is essential that employees make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

f. Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children are at greater risk.

g. Employees should be aware of the importance of:

i. Challenging inappropriate behaviours

ii. Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up

iii. Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

h. If employees have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our Academies approach to this type of abuse.

D.13 Serious violence

a. Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

i. Increased absence from school

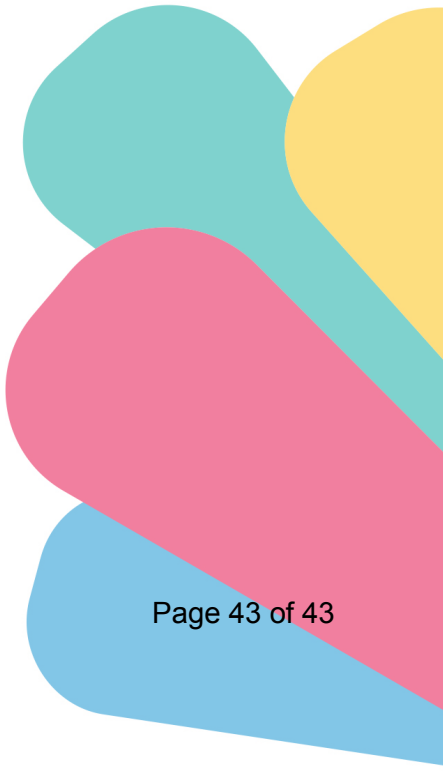
ii. Change in friendships or relationships with older individuals or groups

iii. Significant decline in performance

iv. Signs of self-harm or a significant change in wellbeing

v. Signs of assault or unexplained injuries

vi. Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above)

b. Risk factors which increase the likelihood of involvement in serious violence include:
   i. Being male
   ii. Having been frequently absent or permanently excluded from the Academy
   iii. Having experienced child maltreatment
   iv. Having been involved in offending, such as theft or robbery

c. Employees will be aware of these indicators and risk factors. If a member or employee has a concern about a student being involved in, or at risk of, serious violence, they will report this to the DSL.